

ATTACHMENT "A"

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2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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WRS, INC., d/b/a)
5 WRS MOTION PICTURE)
6 LABORATORIES, a)
corporation,)
Plaintiff,) Civil Action
vs.) No. 00-2041
PLAZA ENTERTAINMENT,)
INC., a corporation,)
ERIC PARKINSON, an)
individual, CHARLES)
von BERNUTH, an)
individual and JOHN)
HERKLOTZ, an)
individual,)
Defendants.)

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DEPOSITION OF JACK NAPOR
VOLUME II

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1 J. Napor - by Mr. Sieminski

2 MR. REILLY: I don't have any
3 other questions.

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5 EXAMINATION

6 BY MR. SIEMINSKI:

7 Q. What was the purpose of your meeting
8 with John Purdy?

9 A. Trying to find additional documents,
10 additional things that he recollects. We had
11 some questions about his conversations with
12 Herklotz which were few but the Herklotz
13 guarantee was the basis under which we kept
14 giving as much credit as we had.

15 Q. Where did the meeting take place?

16 A. In our office.

17 Q. You asked Mr. Purdy to come in and
18 look in your office for additional documents
19 that might have some relevance to this matter?

20 A. Yes, and anything he could suggest
21 or remember that I might not have.

22 Q. What did he suggest or remember that
23 you couldn't recall?

24 A. I don't remember getting any
25 additional information. He basically supported

1 J. Napor - by Mr. Sieminski
2 what I recollect and remembered. I don't
3 think he was able to find any additional
4 documents. That's my recollection of it.

5 Q. What about the meeting with Joe
6 Shields?

7 A. Joe continues to work for us on a
8 part-time basis. I asked Joe when I was
9 looking for the statements for example that we
10 found in the box, you had asked that and I
11 didn't know where they were and so Joe told me
12 how and where to find them.

13 Q. Where does Joe Shields live?

14 A. South Hills.

15 Q. Joe Gerek, where is he?

16 A. Don't know. He moved from
17 Pittsburgh. I hear he moved south somewhere
18 but I don't know, Florida perhaps.

19 Q. Do you know where Melanie Verliin
20 lives?

21 A. No.

22 MR. SIEMINSKI: Okay, those
23 are all the questions I have. Thank you.

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